

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA (PITTSBURGH)**

IN RE:	)	BANKRUPTCY NO. 15-23207-JAD
	)	
WILLIAM J. BORLAK	)	Chapter 13
	)	
Debtor.	)	Document No.
	)	
DEUTSCH BANK NATIONAL TRUST,	)	Hearing: August 9, 2016
AS TRUSTEE FOR AMERIQUEST	)	at 10:00 am
MORTGAGE SECURITIES INC.,	)	
ASSET-BACKED PASS0-THROUGH	)	
CERTIFICATES, SERIES 2005-R1, BY	)	
ITS SERVICER OCWEN LOAN	)	
SERVICING, LLC	)	
	)	
Movant	)	<b>ANSWER TO MOTION FOR RELIEF</b>
	)	<b>FROM AUTOMATIC STAY</b>
	)	
	)	
vs.	)	
	)	
WILLIAM J. BORLAK, Debtor and	)	
ROSEMARY CRAWFORD, Chapter 7	)	
TRUSTEE,	)	
	)	
Respondents.	)	

**ANSWER TO MOTION FOR RELIEF FROM AUTOMATIC STAY**

AND NOW, comes the debtor, William J. Borlak, by and through his attorney, Max Feldman, Esquire, answers to movant's motion for Relief from Automatic Stay as follows:

1. Paragraph One of movant's motion is admitted.
2. Paragraph Two of movant's motion is admitted.
3. Paragraph Three of movant's motion is admitted.
4. Paragraph Four of movant's motion is admitted.

5. Paragraph Five of movant's motion is admitted.
6. Paragraph Six of movant's motion is admitted.
7. Paragraph Seven of movant's motion is admitted.
8. Paragraph Eight of movant's motion is admitted.
9. Paragraph Nine of movant's motion is denied and strict proof is demanded at the time of hearing.
10. Paragraph Ten of movant's motion is denied. Upon reasonable investigation debtor is without knowledge or information sufficient to form a belief as to the truth of this averment.
11. Paragraph Eleven of movant's motion is denied. Upon reasonable investigation debtor is without knowledge or information sufficient to form a belief as to the truth of this averment.
12. Paragraph Twelve of movant's motion is denied and strict proof is demanded at the time of hearing.
13. Paragraph Thirteen of movant's motion is denied and strict proof is demanded at the time of hearing.

WHEREFORE, Debtor respectfully requests this Honorable Court deny Movant's Motion for Relief from Automatic Stay.

Respectfully submitted,

/s/ Max Feldman  
Max Feldman, Esquire  
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